



***Radio Technical Commission for Maritime Services***

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**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554**

In the Matter of	)	
	)	
Amendment of the Commission's Rules	)	WT Docket No. 04-344
Regarding Maritime Automatic Identification	)	
Systems	)	
	)	
Petition for Rule Making Filed by National	)	RM-10821
Telecommunications and Information	)	
Administration	)	
	)	
Emergency Petition for Declaratory Ruling	)	
Filed by MariTEL, Inc.	)	
	)	December 28, 2004
	)	

**COMMENTS OF THE RADIO TECHNICAL COMMISSION FOR MARITIME  
SERVICES (RTCM)**

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits these Comments in response to the Notice of Proposed Rulemaking published in the Federal Register on November 15, 2004 (69 FR 65570).

The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications

services, suggesting ways to keep rules and regulations to the minimum essential for effective maritime telecommunications and making recommendations on important issues involving maritime telecommunications.

RTCM supports the Commission's proposal to designate VHF maritime Channels 87B and 88B for exclusive Automatic Identification System (AIS) use in the U.S., in keeping with the international allocation of those channels for AIS. Although the AIS system is designed to cope with alternate channels, we believe that it is in the best interests of safety and security, to use the internationally allocated channels for this purpose. This will simplify AIS in the U.S. and allow the seamless operation of AIS internationally, by eliminating the need for ships to change their AIS frequencies as they enter and depart U.S. waters, and by avoiding the establishment of transitional zones where ships might be operating on different AIS frequencies. Operational complexities in transitional zones increase the possibility of errors with potential serious consequences.

RTCM concurs that the public interest would be served by designating channels 87B and 88B for AIS operations in the U.S. Settling the channel issue will enable all parties to move forward.

RTCM supports the elimination of note US223 to the Table of Frequency Allocations. AIS channels should be dedicated exclusively to AIS operations, therefore modifying the note to indicate that AIS transmissions merely have priority, is not appropriate. If

channel 88B is to be allocated to exclusive AIS usage, the note will have no effect, and should be removed.

We reiterate that the U.S. should allocate wideband simplex channels 87B and 88B to exclusive AIS usage, in concert with their international allocation. Therefore, the question concerning the alternative of using narrowband duplex channels for AIS is moot. Furthermore, as the Commission points out, use of alternative channels would not make channels 87B and 88B available for unrestricted VPC use, because ships operating in international waters offshore would still use these channels for their AIS operations.

As a result of our position on the use of channels 87B and 88B, RTCM does not believe that the MariTel Frequency Coordination and Sharing proposals would provide any benefit. There is no reason to adopt them. We concur with the Commission's rejection of these proposals for all the reasons given in the Memorandum Opinion and Order and Notice of Proposed Rule Making..

RTCM urges that channels 87B and 88B be reserved for exclusive AIS use not only in maritime VPCsAs, but also in all inland VPCsAs where navigable waterways exist. RTCM believes that AIS will become a valuable navigational safety tool not only in coastal waters, but also on inland waterways. AIS is designed to interface with other electronic navigational equipment. When connected to electronic navigational displays that include charts, AIS can plot the position of every AIS-equipped vessel in VHF range. In narrow, obstructed, or winding waterways, this gives AIS the ability to "see" around

islands and bends in rivers where radar can not reach, significantly improving navigational safety. U.S. inland waterways have popular passenger vessel services and large barge tows which are limited in their ability to maneuver. We think that AIS will become an important navigational tool for these vessels. Furthermore, many of the vessels that operate on inland waterways eventually reach coastal waters where oceangoing vessels operate. All of these vessels should be able to use a seamless AIS system covering all navigable waterways.

For the Radio Technical Commission for Maritime Services

A handwritten signature in black ink, reading "R L Markle". The signature is written in a cursive, flowing style with a large, prominent "M".

R. L. Markle  
President